JUN 24 1991

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## BEFORE THE COPYRIGHT ROYALTY TRIBUNAL Washington, D.C. 20009

1989 Satellite Carrier Royalty Distribution Proceeding

CRT Docket No. 91-1-89SCD

COMMENTS OF U.S. COMMERCIAL TELEVISION BROADCASTER CLAIMANTS ON EXISTENCE OF CONTROVERSY AND NOTICE OF INTENT TO PARTICIPATE

The U.S. Commercial Television Broadcaster Claimants ("Broadcaster Claimants") 1/, by their counsel, submit these comments in response to the Notice issued by the Copyright Royalty Tribunal on May 14, 1991.

The Broadcaster Claimants believe that a controversy currently exists with regard to the distribution of 1989 satellite

The Broadcaster Claimants Group includes the following stations retransmitted by satellite carriers during 1989: KMGH, KTLA, KTVT, KWGN, WGN, WPIX, WSBK, WTBS and WWOR.

royalties. The Broadcaster Claimants intend to participate in any 1989 Distribution Proceedings before the Tribunal.

Respectfully submitted,
BROADCASTER CLAIMANTS

By:

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Their Counsel

Dated: June 24, 1991

## CERTIFICATE OF SERVICE

I, Pamela Jo Kepner, hereby certify that I have, on this twenty fourth day of June, 1991, caused copies of the attached "Comments of U.S. Commercial Television Broadcaster Claimants on Existence of Controversy and Notice of Intent to Participate" to be mailed first class, postage prepaid, to the following parties:

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JIS:pjk 00664.010

June 24, 1991

The Hon. Mario Aguero Chairman Copyright Royalty Tribunal 1825 Connecticut Avenue, N.W. Suite 918 Washington, D.C.

> Re: 1989 Satellite Royalty Distribution Proceeding (CRT Docket No. 91-1-89SCD)

Dear Chairman Aguero:

Transmitted herewith for filing on behalf of Broadcaster Claimants, are an original and five copies of "Comments of U.S. Commercial Television Broadcaster Claimants on Existence of Controversy and Notice of Intent to Participate".

Should there be any questions regarding this matter, please communicate with this office.

John f. Stewart, Jr.

Enclosure